Exhibit I

Adrienne Marshall

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
----------X
In Re:

TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----------X

GERARD PATRICK AHEARN, et al.,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

AFFIDAVIT OF ADRIENNE MARSHALL

20-CV-00355 (GBD)(SN)

----------X

STATE OF NEW YORK)
: SS.:
COUNTY OF RICHMOND)

ADRIENNE MARSHALL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 24 Strawberry Lane, Staten Island, NY 10312.

2. I am currently 67-years old, having been born on May 26, 1954.

3. I am the wife of James J. Marshall, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from lung cancer on November 30, 2014, at the age of 62. The cancer had metastasized to his liver and brain. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My husband and I had a good relationship. We always got along great. He was an FDNY firefighter, and we loved our friends in the fire department. We loved to travel together. We always went to Florida. We went to Las Vegas and Myrtle Beach. We loved Atlantic City. He had a side business, too, and he was constantly working. He loved barbecuing and having people over at the house. We always entertained our friends and neighbors. It was a good life. I

miss it.

6. My husband and my son Jimmy were FDNY firefighters, and they both responded to the World Trade Center site. They responded right away on 9/11/2001 and continued to work at Ground Zero for another three months after that. Every day, my husband would go to the firehouse, get his assignment, and work for hours straight at the site. He would be gone for two days at a time or more. It went on like that for three to four months straight. James was looking for his friends in the rubble…we lost a lot of friends that day. He was searching through the debris for bodies. He wasn't emotionally well after that.

7. In 2012, went to a World Trade Center Health Program physical for James, and the doctor told us that he saw "a shadow between his lungs." At the time, it didn't seem like anything was wrong with him. They thought it was scar tissue. We went to the Brooklyn MetroTech hospital, and the doctor told us it was inoperable small-cell lung carcinoma. They told us there was nothing they could do and gave him a prognosis of two years to live.

8. They started him on chemotherapy and radiation. He went through those treatments for about a year. The chemotherapy and radiation really knocked him out. He would go back for PET scans, but the tumor wasn't shrinking. His cancer was metastasizing. It was spreading throughout his lungs, to his kidney, and even to his brain. I remember his attitude started to change. He started to get dementia from the cancer spreading to his brain. I remember my son Jimmy called me one day and said, "You have to come home. Dad is chopping up the kitchen floor." I came home and he was literally chopping up my ceramic kitchen floors with construction tools. I told him, I'm not going back to work. I need to take care of you 24/7. I was devastated. I didn't want to leave him alone, I couldn't function anymore. I saw how cancer destroyed his body. James was a big, husky guy and the cancer dwindled him down to nothing. I'll never forget the way that he looked.

9. I was in charge of James's day-to-day care. At first, I was working full-time as a pharmacist, so it was hard to take care of him. We got him a male nurse, who came once a week to check in on him. He was in so much pain, but I remember that James would refuse to take any medications. He only took Ibuprofen and that was just a week before he died. We had a hospice nurse sent in after a while from NYU Langone. He had only two visits with the hospice nurse before he died.

10. James was a great man. He would do anything for anybody. He had a lot of

friends. I was devastated by his death. We had our future planned, we were going to sell the house and move down south for the winter. All are dreams are gone now. He was my partner and my best friend. We could've gone on so many vacations and had wonderful times. Now, when I go on vacation, there's no one to go with. I don't want this retirement if it's not with my husband. My three sons have suffered greatly too. Whatever amount of money I may receive in this lawsuit, I will put it towards my grandkids' college funds. Since the passing of my husband James, I am totally distraught. I will never move or leave this house. Our block will be named after and in honor of my husband.

ADRIENNE MARSHALL

Sworn to before me this
15th day of April, 2022

Donna S. Messina
Notary Public

DONNA S MESSINA
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01ME4889688
Qualified in Richmond County
My Commission Expires 4-13-2023

James J. Marshall Jr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
----------X
In Re:

TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----------X
GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF ADRIENNE MARSHALL on behalf of JAMES J. MARSHALL, JR.

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
----------X
STATE OF NEW YORK)
: SS.:
COUNTY OF RICHMOND)

ADRIENNE MARSHALL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 24 Strawberry Lane, Staten Island, New York 10312.

2. I am the mother of James J. Marshall, Jr., or "Jimmy," as he was known to me, who passed away on October 8, 2020. Jimmy was also a plaintiff in the within action and died subsequent to the filing of this lawsuit.

3. Jimmy was born on December 20, 1976 and was the son of James J. Marshall, upon whose death his claim is based. I submit this Affidavit on Jimmy's behalf in connection with the pending motion for a default judgment and in support of his solatium claim.

4. My son lost his father to lung cancer on November 30, 2014. It was medically determined that my husband's illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Jimmy and his father were always close, although there were some tumultuous times when Jimmy was a teenager. Jimmy looked up to his father and wanted to be just like

him, so he also joined the FDNY. Once he became a firefighter, he truly matured, and his bond with his father only strengthened. Jimmy and James were so close. They would go to social outings and on trips together for the Fire Department.

6. We are an FDNY family. We have a long history of working for the fire department in our family. Both Jimmy and James responded to the World Trade Center site together on 9/11. They were both part of the search and recovery effort, and they dug through the rubble to find the bodies of victims. For a while, Jimmy was assigned to work at the makeshift morgue near the World Trade Center. I remember Jimmy called me on the phone once and said, "Mom, I can't take it. Call Dad and tell him I have to get out of here." They were bringing in all these body parts. It was terrible and traumatizing. Both Jimmy and James responded to the 9/11 disaster for about three to four months straight.

7. We were all with James at NYU Langone when he got his lung cancer diagnosis. We were all in complete shock, especially Jimmy. We just looked at each other and thought, "Now what?" The doctors told us that James's cancer was incurable and that we should get his affairs in order. We knew James was going to die. Emotionally, that had a huge impact on Jimmy. He would break down and cry a lot. Following his father's death, Jimmy started drinking a little too much and became extremely depressed. He had a very hard time coping with the loss of his father.

8. Because Jimmy was on a firefighter's schedule, he had more time to spend with his father. Jimmy spent all his days off taking care of James when he got sick. If James needed someone to go to the store, or look after him at home, or even just someone to keep him company, Jimmy was always there for him. He would take extra time off to help his dad whenever he needed. It was difficult for Jimmy to see his father's rapid decline. James's mental state deteriorated as the cancer spread to his brain. Jimmy watched his father turn from a strong, independent man into a weakened and unstable version of himself.

9. James was Jimmy's best friend. Jimmy would always say what a great man his father was. He cried all the time, both during James's illness and after he died. Jimmy would

always tell me how much he missed his father. Sometimes the loss was more than he could bear.

ADRIENNE MARSHALL, on behalf of
JAMES J. MARSHALL, JR.

Sworn to before me this
23rd day of May, 2022

Notary Public

STEPHEN J. FLYNN
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01FL6406832
Qualified in Richmond County
Commission Expires April 20, 2024

Thomas Marshall

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
----------X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----------X
GERARD PATRICK AHEARN, et al.,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

AFFIDAVIT OF THOMAS MARSHALL

20-CV-00355 (GBD)(SN)

----------X
STATE OF NEW YORK)
: SS.:
COUNTY OF RICHMOND)

THOMAS MARSHALL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 177 Jumel Street, Staten Island, NY 10308.

2. I am currently 42-years old, having been born on September 29, 1979.

3. I am the son of James J. Marshall, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on November 30, 2014. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Growing up, we were a sports family. My father always encouraged us to play sports, and he was there for every game. Baseball, football, everything. He was my little league coach. In middle school and high school, he was the president of the Football Parents' Club. He volunteered so much of his time to us, from fundraising for special events to long drives for away games. He'd always run the concession stands at the games. He supported me and my brothers' athletic careers. I played college football for Stony Brook University, and whenever I

traveled to away games, he always came to watch me. In 2001, I played a game against Saint John's University, and it was my dad's first day off from working at the Ground Zero site. He came to see me play. It was maybe the first time in weeks that he had off work since the day of 9/11/2001.

6. It was all hands-on deck on 9/11. My father was an FDNY firefighter, and he responded to the World Trade Center site right away. He was involved in the clean-up, search, and rescue. His specialty was searching the rubble and voids. He was trying to rescue survivors. That first day that he had off, when he came to my football game, the publication Newsday wrote an article about him. I actually still have the article. It was a surreal moment. For me, 9/11 was something I had just seen on television. But my father actually lived it. He was dealing with it in person.

7. I remember we were all sat down at the kitchen table and told of my father's cancer. I was in shock. This was right after my parents met with the oncologist at NYU Langone. The doctors gave him a prognosis of only six weeks to three months to live. He was diagnosed with aggressive, malignant small cell lung cancer. It was the worst type of lung cancer that a person could get. At the time, in 2012, my daughter was only a year old. My wife was pregnant with our son. I was reeling from the news, trying to juggle having two infant children while my father was dying.

8. I tried to do as much for him as I could. Life was getting away from me. I had a job and my own family to take care of. It was hard. I wish I spent more time with him. I was constantly checking with my brothers to see how my dad was. I owe a lot of credit to my mom and my brother Jimmy for taking care of my father day-to-day. I would take off work to bring my dad to his doctors' visits and chemotherapy treatments. Just trying to bring him some comfort and support. I would visit him at his house as often as I could. I tried to be optimistic and put on a brave face for him. When he passed, I helped arrange the funeral and pay for it. His illness and death were a huge weight on our family.

9. More than anything, my father left a legacy. I appreciate taking the time to talk about him, and I want more people to know his story. He was a hardworking man. He was a great father, a great husband to my mother, and a devoted fireman. He wasn't always perfect, but he was our father. No compensation can ever heal the pain that my family and I went

through. We want to hold the people responsible for this tragedy accountable. This is a way to validate his legacy and his existence, and to reflect on his importance.

THOMAS MARSHALL

Sworn to before me this
2 day of ~~April~~ May, 2022

Notary Public

KATHLEEN ANDRILLO
STATE OF NEW YORK
NOTARY PUBLIC
Qualified in Richmond County
01AN6177392
MY COMMISSION EXPIRES 11/13/2023

Vincent Marshall

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
----------X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----------X
GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF
VINCENT MARSHALL

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
----------X
STATE OF NEW YORK)
: SS.:
COUNTY OF RICHMOND)

VINCENT MARSHALL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 7119 Amboy Road, Staten Island, NY 10307.

2. I am currently 39-years old, having been born on March 29, 1983.

3. I am the son of James J. Marshall, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on November 30, 2014. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I had a close relationship with my father growing up. When I played little league, he was always my coach. When I played high school football, he was the president of the Football Parents' Club. When I was a kid, watching my older brothers play football, I'd keep him company while he ran the concession stand. We played together on a bowling team when he retired from the FDNY. I loved bowling with him. We would travel together as a family. We went to Florida, Myrtle Beach, Las Vegas, Atlantic City. He taught me how to play poker.

6. On 9/11/2001, my dad was supposed to be off work. He went to my mom's job and told her, "I have to go to the World Trade Center." He was an FDNY firefighter and was assigned to search and recovery operations. He was there for weeks working on the World Trade Center site, trying to dig people out of the rubble. I remember the first time he came home from Ground Zero. He was covered in dust, and his firefighter uniform smelled like gas and jet fuel. He kept going back to the site, and there were times that I wouldn't see him for days. He probably responded to the World Trade Center on a consistent basis until January 2002.

7. I was home one day when my parents sat me down in the kitchen and told me they had found a lump on my dad's lungs. They told me not to worry about it. My mom got a call from the doctor confirming that it was cancer. So, I said okay, and I tried not to think about it. My dad started chemotherapy soon after. I would come with him to his chemo treatments. Watching him sitting in the chair in pain, receiving the treatments, which was hard. I'd try my best to keep his mind at ease. Just keeping him company or buying him a Gatorade and a sandwich when he was hungry. I wanted to be his advocate. The doctors told me they wanted to get an early start on radiation, even though there was no reason to do such an aggressive treatment. I told the doctors I didn't like that, and I knew my dad wouldn't either. I was trying to prevent him from experiencing any additional pain.

8. We knew my father was going to pass from cancer, and it was hard to sit there and wonder when it was going to happen. I would just sit at home, nervous that it was happening. One day I was on my lunch break at work, and I called my mom to see how my dad was doing. She said, "Oh, he's just relaxing." What she didn't tell me is that he had actually died earlier that day. She didn't want me to worry and miss work. I was working in sales at T-Mobile, and it was getting close to Black Friday. It was the busiest time of the year. I didn't find out until later that day that my father had died.

9. It was a shock once he was gone. I would always go to his burial plot, just to see him. It was hard for me to believe that he was really gone. My father had a great career as an FDNY firefighter. He was a great leader, and he always looked out for people. He helped people. He was an electrician on the side, and he'd always make sure that people's lights and air conditioning were working. He was a caring person. He enjoyed life. He loved golf, horseshoes,

and bowling. He was a fun, loving, and energetic guy, He was my dad, and I loved him. My loss of him is devastating.

VINCENT MARSHALL

Sworn to before me this
13 day of April, 2022

Notary Public

LAURA CATHERINE NIEVES
Notary Public - State of New York
NO. 01NI6402755
Qualified in Richmond County
My Commission Expires Jan 13, 2024

Jennifer Green

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----------X

In Re:

TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----------X

GERARD PATRICK AHEARN, et al.,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

AFFIDAVIT OF JENNIFER GREEN

20-CV-00355 (GBD)(SN)

----------X

STATE OF NEW YORK)
: SS.:
COUNTY OF SUFFOLK)

JENNIFER GREEN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 391 Erie Street, Holbrook, NY 11741.

2. I am currently 50-years old, having been born on July 17, 1971.

3. I am the daughter of James Bronson Munro, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died from chronic obstructive pulmonary disease on June 29, 2012. The World Trade Center Health Program determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was very close with my dad. I always visited my parents when they were camping and doing fun things in retirement. My dad and I loved to go out crabbing, and we had many talks over the years. I went to him for many of my issues and concerns, and he would always have the best advice for me. I had a great relationship with him.

6. I remember on September 11, 2001, my dad came home from work and talked about it. He was obviously very distraught, as he witnessed the attacks with his own eyes. He

talked about how he was at work that day, and how he and his coworkers heard this "enormous sound." They went up to the roof, and saw the second plane hit the World Trade Center. At the time, it was just pure devastation. Like the rest of us, he didn't know it was a terrorist attack until later.

7. My dad was an auto mechanic for the FDNY. In the days following, he said they brought the damaged and destroyed fire apparatus right to his shop. I even have a picture of him standing by as they hosed down a fire truck covered in all the dust, ash, everything. He showed me pictures he took at work of the cars and trucks that came in completely destroyed. They weren't even recognizable. I knew that my dad's exposure was immediate just from how much dust he came home covered in every day.

8. In 2003, I started to notice that my dad's health was declining. We went on a family cruise together. We would all get off the ship, and my dad couldn't even make it to the end of the dock without stopping to catch his breath. I remember it so clearly. We were in Jamaica, and it was a beautiful day. We got off the ship, and everyone was walking ahead a bit. I stayed back with my dad and noticed how labored his breathing was. That really stood out to me.

9. It was hard to see him slowly fade away. He had his mind and his wits about him, but he was losing his drive and passion. The things he used to love didn't interest him anymore. He became increasingly depressed. He kept asking for greater dosages of his depression medication. It killed his spirit when he couldn't do the things he wanted to. I would always try to make him laugh, and we would have our laughs. But I saw him struggle. I remember he was helping me spackle my house, and he was struggling to even do it. He would break into these horrible coughing fits. But I couldn't even ask him if he was okay, because I knew he didn't want to be seen as helpless. He was aware that he was struggling, and that made it more difficult. At times, he got extremely frustrated or angry.

10. My mom took the burden of caring for him. I would always try to be there to help out my mom. Calling in, checking in, or just stopping by. My dad ended up having increased hospitalizations over time. I remember my dad always liked to be clean shaven. One time he was in the hospital and he asked me to help him shave. I was petrified—I didn't want to cut him. And I was sad, because he couldn't do it himself anymore.

11. The day before my father passed, we just sat, talking for two hours about everything and nothing. He said, "I'm getting ready. I don't enjoy eating anymore, I don't enjoy getting out of bed." I knew what he meant. He gave me an envelope with the things he wanted to be shared before he passed. I didn't even believe him, honestly, I told him that I would see him soon. I remember watching the footage from the exterior camera on my house after my dad passed. That day, after he left my house, he sat in his car for another thirty minutes before driving away.

12. I want to mention that my seven-year old son is named in honor of my father.

JENNIFER GREEN

Sworn to before me this
11 day of April, 2022

Notary Public

Mary Frances Catalano
Notary Public, State of New York
Qualified in Suffolk County
Commission No. 01CA6361483
My Commission Expires July 10, 2025

Joan Elizabeth Munro

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
----------X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----------X
GERARD PATRICK AHEARN, et al.,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

AFFIDAVIT OF
JOAN ELIZABETH MUNRO

20-CV-00355 (GBD)(SN)

----------X
STATE OF NEW YORK)
: SS.:
COUNTY OF SUFFOLK)

JOAN ELIZABETH MUNRO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 55 Normandy Drive, Holbrook, NY 11741.

2. My date of birth is June 24, 1946.

3. I am the wife of James Bronson Munro, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband died from chronic obstructive pulmonary disease on June 29, 2012. The World Trade Center Health Program determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. James and I were married for 40-something years. We always had an active life. He worked until 2006. We camped, we did a lot of traveling, and he was a great builder. James was an auto mechanic for the FDNY. We enjoyed our life: our friends, family, children, and grandchildren.

6. James worked for the FDNY for 25 years. He had about 20 years of service by 2001. On September 11, 2001, my husband was on duty, working at the FDNY Repair and

Transportation Unit in Long Island City. He was a mechanic and also a supervisor of mechanics. James witnessed the second plane hit the World Trade Center as he was standing on the roof of the building. They started bringing in damaged and destroyed vehicles covered in debris right away. He went down to the World Trade Center site a few times. These trucks were so contaminated with dust and debris. They even found body parts on one of the fire apparatuses.

7. Within a few months after 9/11, James started having difficulty breathing. I recognized his shortness of breath right away, as I happen to be an EMT. Even going up a flight of stairs would give him shortness of breath. He was getting worse and worse, so we had to put him on oxygen therapy and medications. He started on oxygen in 2003. Years later, he had a heart attack. At one point, the doctors suggested giving him a lung transplant, but his heart was too weak to safely perform the surgery.

8. I'm in the medical field, so I was aware of what was going on with him. I knew it was a degenerative situation—it was only going to get worse. Our activities stopped. We stopped going camping. His ability to do daily tasks slowed down significantly. In the last year or two of James's life, he couldn't even drive because he was so short of breath. I was afraid that he would be a danger to himself on the roads. I stayed home more and more with him, and it was sad to watch him really struggle. I remember times where he couldn't even shower by himself. He couldn't walk 100 feet without being out of breath, and he even passed out a couple of times from the lack of oxygen. I was taking care of him every day with the help of my children.

9. The respiratory issues were the biggest problem. They made everything else worse. He had significant heart problems. Aside from his heart attack, he needed the oxygen 24/7 to keep his heart working regularly. His skin was paper thin, he would bruise so easily. I remember watching him bleed from just a little bump.

10. James's depression worsened during the course of his illness. It was very difficult to see him that way. If the respiratory disease disabled him partially, the depression disabled him in every other way. He saw a psychologist for a while, sometimes it helped for him to talk to someone but oftentimes it didn't. His depression magnified as his illness progressed. He was depressed because he couldn't do the day-to-day things he wanted to. My kids and I tried to

keep him engaged and do small things that he might enjoy to bring him out of his depression for a while. But towards the end, even going out to dinner was a big deal. He was sleeping day and night, just sitting in the house. He wasn't himself.

JOAN ELIZABETH MUNRO

Sworn to before me this
20th day of April, 2022

Notary Public

LISA A. SCOTTO
NOTARY PUBLIC, State of New York
NO. 01SC5021439
Qualified in Suffolk County
Commission Expires: June 21, 2022

Barbara Munro-Garcia

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
----------X
In Re:

TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----------X
GERARD PATRICK AHEARN, et al.,

Plaintiffs,

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

AFFIDAVIT OF BARBARA MUNRO-GARCIA

20-CV-00355 (GBD)(SN)

----------X
STATE OF NEW YORK)
: SS.:
COUNTY OF SUFFOLK)

BARBARA MUNRO-GARCIA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 55 Normandy Drive, Holbrook, NY 11741.

2. I am currently 52-years old, having been born on June 18, 1969.

3. I am the daughter of James Bronson Munro, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died of chronic obstructive pulmonary disease on June 29, 2012. The World Trade Center Health Program determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was always very close with my father. We did a lot of things together: camping, crabbing, and fishing. He showed me how to take care of my car. He was very active, always going out, going on trips. He always enjoyed doing wood work. He loved to make things for the church. He even built the altar at the church. He always wanted to give back to the community. He was also a wonderful grandfather to my two daughters, who loved him dearly. He was their

buddy.

6. I know that my father went down to the World Trade Center at least once. He was an auto mechanic for the FDNY. He told me how much of a mess that Ground Zero was. He showed me pictures of all the destroyed vehicles in the shops. Everything was coated in dust, and all the vehicles were really mangled.

7. After that, he started to be on the depressed side. He was constantly on the computer, constantly looking at the news about 9/11. He spent a lot of time reading about his close friend, Mychal Judge, the American priest who served as a chaplain to the FDNY and passed on 9/11. Sometimes, he would become very agitated, and very nasty, especially to my mother. He started to take his anger out on everybody.

8. My father was always very outgoing and active, but he started coughing a lot shortly after the 9/11 attacks. He started slowing down a lot. He had to go on oxygen soon thereafter. In 2004-05, he started having congestive heart failure. Part of his heart died, and his lungs couldn't keep up. It got a lot worse after that. In 2007, I went through a divorce and moved into my parents' home with my two daughters. My two daughters were a saving grace to my father because they boosted his mood. I spent more and more time caring for my father.

9. It became harder and harder for my dad to do regular, daily activities. He used to go to Dunkin Donuts every day to get his iced coffee and donut in the morning. But I could see that it was harder for him to get down the stairs and into the car. He had to give up woodworking because he didn't have the energy anymore. It sank him into a depression. It was hard to see someone slowly slip away from you.

10. I was the one who found my father the morning that he passed away. He was sitting at the kitchen table and was having a hard time breathing. He told me he was going to go to Dunkin Donuts to pick up some breakfast. I told him that he didn't look so good, and I thought that he should stay home. Twenty minutes later, as I was about to leave for work, I realized he wasn't at the kitchen table anymore. I found him sitting in the front seat of his car, dead. He had his oxygen tank on, but he couldn't get enough into his lungs to keep him going. I had a death phobia to begin with, so this gave me a huge anxiety attack. My body went into shock, and I had to go to the hospital. It took me a long time to even be able to look at his car again. Whenever I get in a car, I start to feel lightheaded, thinking about what I saw. His death

affects me even to this day.

BARBARA MUNRO-GARCIA

Sworn to before me this
6 day of April, 2022

Notary Public

THOMAS CONDEMI
Notary Public - State of New York
NO. 01CO6355331
Qualified in Suffolk County
My Commission Expires Nov 18, 2025

Christine Vetter

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
----------X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----------X
GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF
CHRISTINE VETTER

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
----------X
STATE OF NEW YORK)
: SS.:
COUNTY OF SUFFOLK)

CHRISTINE VETTER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 89 Spring Meadow Drive Holbrook, NY 11741.

2. I am currently 54-years old, having been born on May 13, 1967.

3. I am the daughter of James Bronson Munro, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died of chronic obstructive pulmonary disease on June 29, 2012. The World Trade Center Health Program determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I am the oldest of my sisters. My father and I were very close. We did lots of camping, almost every weekend or every other weekend. My dad was a very capable person. If someone called him for help, even if it was in the middle of the night, he would always go to help them. He was also a wonderful father. My two sisters and I all got married within six

months of each other and all bought houses right away. My dad fixed up all three of our houses. As a father to three daughters, he wanted all of us to be independent. My father was my supporter and my confidant. Whenever I had issues in life or with work, I would call him and bounce ideas off of him. He was patient and a good listener, he had good advice.

6. My dad told me about his experience on September 11, 2001 when it happened. When the first plane hit the World Trade Center, he went up to the roof. He saw the second plane hit and the towers collapse. It was an emotional day, he lost a lot of friends and coworkers. When the rigs came into his shop in various states of disrepair, they were covered in dust and debris. He shared his concerns with me about not knowing what kind of toxins he was working with. It continued to affect him physically and emotionally, but it was mostly mentally draining. There was so much repair work that needed to be done.

7. You could soon start to see his respiratory illness develop. He had a pronounced cough, he lost his energy, and he couldn't walk long distances. We had taken a family trip to Florida and rented a house. He had to ride a scooter everywhere and take an oxygen tank with him. He was struggling, and I could see he was tired. But he wanted to be there for his family, especially his grandchildren.

8. It started with the coughs, then not being able to walk. Then the difficulty doing simple tasks. He used to fix our cars for us, but as he got sicker we'd have to take them to an auto body shop. That really bothered him. He felt helpless when he couldn't help us anymore. He was a giving person, and it killed him inside to not be able to help us.

9. Emotionally, it was hard to see him deteriorate. It was hard to know that his illness really bothered him. I saw him get agitated and short tempered. He was frustrated by his physical conditions and his depression. I felt helpless that I couldn't do more for him.

10. My children are growing up without their grandfather. My children were only 10 and 6 years old when he died. They barely remember him. He passed, and he didn't get to see the birth of his last grandchild. Of course, we miss him. But my children, my nieces and nephew can't experience how great of a person he was. I drive past Pinelawn Cemetery when I drive

home from work. Sometimes, when I have a hard day, I stop by his grave. I think, "Dad, if you can hear me, please help me through this."

Christine Vetter

CHRISTINE VETTER

Sworn to before me this
19 day of April, 2022

Notary Public

Lauran Margaret D'Agostino
Notary Public, State of New York
No. 01DA6057853
Qualified in Suffolk County
Commission Expires April 30, 2023